

# Slotnick Declaration Ex. B

December 21, 2016

**Via Email & Mail**

Barry Slotnick  
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New York, NY 10154  
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**Re: Craig v. Universal et al. No. 1:16-cv-5439 (JPO)**

Dear Barry and Linna:

On behalf of Glen Craig (“Craig”), we write in response to Defendants’ Universal Music Group, LLC’s, Kingsid Ventures LLC’s, and the Estate of Riley B. King’s (respectively “UMG”, “Kingsid” and “Estate” or collectively “Defendants”) deficiency letter.

1. No documents have been withheld based on objections.
2. While Defendants are entitled to know how and when Craig learned about the infringements, Craig is under no obligation to provide the Defendants copies of phonographs in his possession. UMG and the Estate have easier and cheaper access to phonographs featuring the infringed photographs and a list of all items in Craig’s possession is provided in the Complaint. We will provide a list of all infringing items along with corresponding information of how and when he discovered these.
3. Craig will produce documents evidencing that UMG’s use was infringing. These are also available on UMG’s email servers at their corporate headquarters.
4. While no documents responsive to Document Request Nos. 16 and 17 have been withheld, it bears noting that since all Defendants are represented by the same firm and submitted one, unified document request, possession, access to or control of documents to one Defendant is fairly imputed to all Defendants.
5. Craig has not withheld any documents responsive to Document Request No. 19 or Interrogatory No. 3. Craig did not have a regular income during the relevant period of time. We will provide information about his sporadic source of income for the time period specified in the request.
6. Craig’s response to Document Request No. 20 simply reiterates the notion that Craig is not withholding any documents or information, but rather that it is impossible to speculate what documents or information will become relevant in opposition to any future Defendants’ motion, hearing, or regarding the issues at trial. At this time, all

relevant documents or information relied upon in the Complaint and reasonably available to Craig will be produced or identified.

7. Craig does not have possess recent contact information for Ruby Mazur. Contact information for the owners of the Morrison Hotel gallery is available online. Sardi Klein and Craig's wife and son may be contacted through the undersigned counsel.

Sincerely,

/s/Richard P. Liebowitz  
Richard P. Liebowitz  
Yekaterina Tsyvkin  
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